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Via Electronic Mail

Robert Curtis
Deployment Director, National Broadband Plan Initiative
Office of Strategic Planning & Policy Analysis
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: GN Docket Nos. 09-47, 09-51 & 09-137
Ex Parte Correspondence Concerning Development of the National Broadband Plan

Dear Mr. Curtis:

This correspondence is a follow-up to Covad Communications Company's November 25, 2009 letter attaching a copy of a study conducted by QSI Consulting Inc. ("QSI") on broadband network unbundling policies and the role of competition in the broadband market in the United States.¹ Attached is an updated version of QSI's earlier Working Paper. In addition to reviewing the economic viability of leasing ILEC facilities where UNEs were available and where they were not, QSI also looks at the economic viability of deploying and self-provisioning last-mile facilities to small and medium sized business customers.

Based on its cost analysis, the QSI study concludes that: (a) where UNEs are not available, a competitor cannot economically offer broadband retail products using an ILEC's facilities and (b) it is "cost prohibitive and economically non-viable" for a CLEC to self provision last-mile facilities in order to offer broadband services to a small or medium sized business customer. The QSI study confirms that limitations on unbundling have hindered the development of the broadband market in the United States.

Please do not hesitate to contact me should you have any questions concerning the foregoing.

Respectfully,

Anthony Hansel

Enclosure

¹ QSI Consulting, Inc., Promoting Broadband Competition, An Analysis of Broadband Network Unbundling Policies and CLEC Broadband Competition (November 16, 2009).